

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOANNA WILSON, as Independent Administrator
of the Estate of Areon J. Marion, Deceased

Plaintiff,

vs.

COOK COUNTY, ILLINOIS, et al.,

Defendants.

Case No.: 22-cv-6886

Honorable Andrea R. Wood

DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME

Defendants, COOK COUNTY, ILLINOIS., COOK COUNTY SHERIFF'S OFFICE, and OFFICER B. VARGAS ("**Defendants**"), by their attorney, KIMBERLY M. FOXX, State's Attorney of Cook County, through her Assistant State's Attorneys ANTONIO LEE and MIA BUNTIC, pursuant to Federal Rule of Civil Procedure 6(b), file this Motion for Extension of Time to respond to Plaintiff JOANNA WILSON'S, AN INDEPENDENT ADMINISTRATOR OF THE ESTATE OF AREON J. MARION, ("Plaintiff") Complaint within 60 days, up to and including February 13, 2023, and state as follows:

1. On December 8, 2022, Defendants filed a Notice of Removal from the Circuit Court of Cook County for the above-referenced case. Dkt. No. 1.
2. On December 12, 2022, the Court scheduled a status hearing on January 10, 2023. Dkt. No. 7.
3. Pursuant to Rule 81(c)(2)(C) of the Federal Rules of Civil Procedure, Defendants must respond to Plaintiff's Complaint within seven (7) days after the notice of removal is filed. Fed. R. Civ. P. 81(c)(2)(C); *also see* Dkt. No. 1.

4. Accordingly, undersigned counsel respectfully requests an extension of time to respond to Plaintiff's Complaint within 60 days, up to and including February 13, 2023. Undersigned counsel seeks the extension in an effort to resolve issues regarding service of process for all named parties in the above-captioned lawsuit, to which undersigned counsel are currently attempting to resolve with Plaintiff. Due to the complexity of this case involving allegations of wrongful death and improper medical care, length of the Complaint, and number of defendants, the requested time will allow Defendants an opportunity to resolve these issues and adequately conduct an investigation into the merits of Plaintiff's allegations.

5. This request is made in part to preserve judicial resources, and not for purposes of causing undue delay or any other improper purpose.

6. Counsel for Defendants conferred with Plaintiff's counsel, who has no objection to this request.

WHEREFORE, Defendants respectfully request this Honorable Court grant the following relief:

1. Grant an enlargement of time of 60 days up to February 13, 2023, to respond to Plaintiff's Complaint; and
2. Grant any other relief this Court deems necessary and just.

Dated: December 15, 2022.

Respectfully Submitted,

KIMBERLY M. FOXX
State's Attorney of Cook County

By: /s/ Antonio Lee .
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On behalf of **SHERIFF's Office and
Officer Vargas**

KIMBERLY M. FOXX
State's Attorney of Cook County

By: /s/ Mia Buntic
Mia Buntic
Assistant State's Attorney
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On behalf of **COOK COUNTY**

CERTIFICATE OF SERVICE

The undersigned certifies that, on December 15, 2022, in accordance with the Federal Rules of Civil Procedure, Local Rule 5.5 and the General Order on Electronic Case Filing, he served this notice, with attachments, on the persons named below by electronic mail prior to 5:00 p.m..

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